

MELANIE D. MORGAN, ESQ.  
Nevada Bar No. 8215  
SCOTT R. LACHMAN, ESQ.  
Nevada Bar No. 12016  
AKERMAN LLP  
1635 Village Center Circle, Suite 200  
Las Vegas, Nevada 89134  
Telephone: (702) 634-5000  
Facsimile: (702) 380-8572  
Email: melanie.morgan@akerman.com  
Email: scott.lachman@akerman.com

*Attorneys for Bank of America, N.A.*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

KATHLEEN SPAIN,

Plaintiff,

v.

EQUIFAX INFORMATION SERVICES LLC;  
BACKGROUNDCHECKS.COM LLC;  
EXPERIAN INFORMATION SOLUTIONS,  
INC.; BANK OF AMERICA, N.A.;  
SPECIALIZED LOAN SERVICING LLC; and  
TRANS UNION LLC,

Defendants.

Case No.: 2:22-cv-00778-CDS-VCF

**STIPULATION AND ORDER TO  
EXTEND TIME TO RESPOND TO  
COMPLAINT**

**(FOURTH REQUEST)**

Defendant Bank of America, N.A. (**BANA**) and plaintiff Kathleen Spain stipulate that BANA shall have up to and including **September 23, 2022**, to file their responsive pleading in this matter. The current deadline is September 2, 2022. Good cause exists to grant the requested extension so BANA and Spain can continue to explore settlement. These parties continue to make progress toward settlement and could use three more weeks to come to resolution. These parties will file a notice of settlement or similar document at the appropriate time.

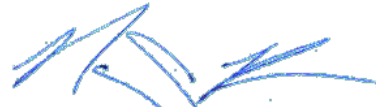
The court ordered the parties to submit a discovery plan two weeks after the first remaining defendant responds to the complaint but not later than October 3, 2022. ECF No. 45. Background checks.com's response is due September 9, 2022, putting the discovery plan deadline on September 23, 2022—the same date BANA will respond to the complaint.

This is the parties third request for an extension of this deadline and is not intended to cause any delay or prejudice to any party. The parties do not, at this time, request the court's assistance in mediating this matter.

DATED this 31st day of August, 2022.	DATED this 31st day of August, 2022.
<b>AKERMAN LLP</b>	
<u>/s/ Scott R. Lachman</u>	<u>/s/ Michael Kind</u>
MELANIE D. MORGAN, ESQ.	MICHAEL KIND, ESQ.
Nevada Bar No. 8215	Nevada Bar No. 13903
SCOTT R. LACHMAN, ESQ.	<b>KIND LAW</b>
Nevada Bar No. 12016	8860 South Maryland Parkway, Suite 106
1635 Village Center Circle, Suite 200	Las Vegas, Nevada 89123
Las Vegas, Nevada 89134	
<i>Attorneys for Bank of America, N.A.</i>	GEORGE HAINES, ESQ.
	Nevada Bar No. 9411
	GERARDO AVALOS, ESQ.
	Nevada Bar No. 15171
	<b>FREEDOM LAW FIRM</b>
	8985 South Eastern Avenue, Suite 350
	Las Vegas, Nevada 89123
	<i>Attorneys for Kathleen Spain</i>

**ORDER**

**IT IS SO ORDERED.**



**UNITED STATES MAGISTRATE JUDGE**  
Case No.: 2:22-cv-00778-CDS-VCF

September 1, 2022

**DATED**